

EXHIBIT A

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: VALSARTAN LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION**

MDL No. 2875

**Honorable Robert B. Kugler,
District Judge**

This Documents Relates to All Actions

**[PROPOSED] SCHEDULING ORDER REGARDING PLAINTIFFS' DISCOVERY TO
WHOLESALE DEFENDANTS AND WHOLESALE DEFENDANTS' DISCOVERY TO
PLAINTIFFS REGARDING LOSARTAN AND IRBESARTAN PRODUCTS**

<u>Discovery item re: losartan and irbesartan (and, where indicated, valsartan)*</u>	Dates	Status
Wholesalers to serve objections and responses to Plaintiffs' RFPs and Rule 30(b)(6) Notice	7/14/2023	Completed
Wholesalers shall serve RFPs and Rule 30(b)(6) notices to TPP Class Representatives and Assignors	8/4/2023	Completed
Wholesalers and Plaintiffs shall meet and confer regarding Plaintiffs' RFPs served on Wholesalers 5/22/2023 and Wholesalers' objections and responses re: losartan and irbesartan	8/25/2023	Agreed upon
Wholesalers shall provide proposed search terms and proposed Wholesaler custodians, three (3) or more, to which such search terms will be applied in the losartan/irbesartan/valsartan actions	8/25/2023	Agreed upon
If Wholesalers and Plaintiffs cannot reach agreement on Wholesalers' responses and objections to Plaintiffs' RFPs re: losartan and irbesartan, Plaintiffs shall file a motion with the Court regarding remaining dispute(s)**	8/31/2023	Agreed upon
Wholesalers and Plaintiffs shall meet and confer regarding the Wholesalers' proposed search terms and Wholesalers' custodians in the losartan/irbesartan/valsartan actions	9/1/2023	Agreed upon
If Wholesalers and Plaintiffs cannot reach agreement on Wholesalers' proposed search terms and Wholesalers' custodians for the losartan/irbesartan/valsartan actions, Plaintiffs shall file a motion with the Court regarding remaining dispute(s)*, **	9/15/2023	Agreed upon
Plaintiffs shall propose search terms and 3 custodians for each TPP class representative and assignor to which such search terms will be applied in the losartan/irbesartan/valsartan actions	9/22/2023	Plaintiffs will not discuss or agree

<u>Discovery item re: losartan and irbesartan (and, where indicated, valsartan)*</u>	Dates	Status
Plaintiffs shall serve objections and responses to Wholesalers' RFPs and Rule 30(b)(6) notices	9/27/2023	Plaintiffs will not discuss or agree
Wholesalers and Plaintiffs shall meet and confer to negotiate and finalize topics for 30(b)(6) depositions of Wholesalers and Wholesalers' objections to Plaintiffs' Notices of Rule 30(b)(6) Depositions served on May 17, 2023 pursuant to CMO 32	9/29/2023	Agreed upon
Wholesalers and Plaintiffs shall meet and confer to negotiate and finalize Wholesalers' RFPs to Plaintiff TPP Class Representatives and Assignors	10/2/2023	Plaintiffs will not discuss or agree
If Wholesalers and Plaintiffs cannot reach agreement regarding final topics for 30(b)(6) depositions of Wholesalers, Plaintiffs shall file a motion with the Court regarding remaining dispute(s)**	10/6/2023	Agreed upon
Wholesalers and Plaintiffs shall meet and confer regarding the TPP Class Representatives' and Assignors' proposed search terms and Class Representative and Assignor custodians to which such search terms will be applied in the losartan/irbesartan/valsartan actions	10/6/2023	Plaintiffs will not discuss or agree
If Wholesalers and Plaintiffs cannot reach agreement on Wholesalers' RFPs to Plaintiff TPP Class Representatives and Assignors, Wholesalers shall file a letter brief regarding the dispute**	10/9/2023	Plaintiffs will not discuss or agree
If Wholesalers and Plaintiffs cannot reach agreement on TPP Class Representatives' and Assignors' proposed search terms and/or custodians to which such search terms will be applied in the losartan/irbesartan/valsartan actions, Wholesalers shall file a letter brief regarding the dispute**	10/16/2023	Plaintiffs will not discuss or agree
Wholesalers shall substantially complete their document production for losartan/irbesartan/valsartan (custodial)	3/11/2024	Agreed upon
Wholesalers and Plaintiffs shall meet and confer to negotiate and finalize the identities of Wholesaler deponents	3/25/2024	Agreed upon
If Wholesalers and Plaintiffs cannot reach agreement regarding the identities of Wholesaler deponents, Plaintiffs shall file a motion with the Court regarding remaining dispute(s)**	4/2/2024	Agreed upon
Plaintiffs shall substantially complete their document production as to Wholesaler RFPs	4/11/2024	Plaintiffs will not discuss or agree
Wholesalers shall serve RFAs and Interrogatories to TPP Class Representatives and Assignors	30 days after Plaintiffs complete document production	Plaintiffs will not discuss or agree
Plaintiffs shall complete all depositions of Wholesalers, including all Rule 30(b)(6) depositions	5/13/2024	Agreed upon

<u>Discovery item re: losartan and irbesartan (and, where indicated, valsartan)*</u>	Dates	Status
Wholesalers and Plaintiffs shall meet and confer to negotiate and finalize the identities of TPP Class Representative and Assignor deponents	30 days following notice to Wholesalers by TPPs of substantial completion of document production in response to discovery from all Defendants	Plaintiffs will not discuss or agree
If Wholesalers and Plaintiffs cannot reach agreement regarding the identities of TPP Class Representative and Assignor deponents, Wholesalers shall file a letter brief regarding the dispute**	45 days following notice to Wholesalers by TPPs of substantial completion of document production in response to discovery from all Defendants	Plaintiffs will not discuss or agree
Wholesalers shall complete all depositions of Plaintiff TPP Class Representatives and Assignors, including all 30(b)(6) depositions	90 days following notice to Wholesalers by TPPs of substantial completion of document production in response to discovery from all Defendants	Plaintiffs will not discuss or agree

NOTES APPLICABLE TO SCHEDULE
<p>*All deadlines apply only to losartan/irbesartan actions except where they expressly mention valsartan action.</p> <p>**Where this agreed-upon discovery schedule provides a deadline for briefing discovery disputes, the propounding party will file an motion on the date noted, no more than ten pages in length, to be followed by an response by the responding party within 7 calendar days, not more than ten pages in length, followed by a 3 page reply letter brief filed by the propounding party within 3 business days of the filing of the response.</p>